

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ZHONG ZHENG, Individually and on behalf of all
others similarly situated,

Plaintiff,

-against-

PINGTAN MARINE ENTERPRISE LTD.,
XINRONG ZHUO, and ROY YU,

Defendants.

Civil Action No. 17-cv-3807(DLI)(ST)

ECF Case

NOTICE OF MOTION

(ORAL ARGUMENT REQUESTED)

PLEASE TAKE NOTICE that, upon the annexed Declaration of Samantha J. Katze, dated July 30, 2018, together with the exhibits annexed thereto, the accompanying Memorandum of Law in Support of Defendant Pingtan Marine Enterprise Ltd.'s Motion to Dismiss the Amended Complaint, dated July 30, 2018, and all prior proceedings herein, Defendant Pingtan Marine Enterprise Ltd. ("Pingtan"), by and through its undersigned counsel, will move this Court, before the Honorable Dora L. Irizzary, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order (1) pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b), and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(b), dismissing Plaintiff's Amended Complaint in this matter, with prejudice, with respect to all claims and causes of action asserted against Defendant Pingtan Marine Enterprise Ltd., for failure to state a claim upon which relief can be granted and failure to plead claims sounding in fraud with sufficient particularity, and (2) awarding such further relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, and reply papers, if any, shall be served pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern and Eastern Districts of New York.

Dated: New York, New York.
July 30, 2018

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